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Ser 1831.3DW/5002
25 Apr 1995

Mr. Tom Lanphar
California Environmental Protection Agency
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2737

Subj: WINTER RAIN EFFECT AT INSTALLATION RESTORATION (IR) SITE 15
NAS ALAMEDA

Dear Mr. Lanphar:

During the progress review meeting of March 14, 1995, a concern was raised about the potential for contaminated material to be transported away from the boundaries of IR Site 15 as a result of the winter rain storms. The purpose of this letter is to address what the Navy has done to contain the storm water within the site, as well as to provide a contingency plan to ensure that any contamination that might have migrated to other portions of the site is properly handled.

In early January of this year, the removal action at Site 15 was halted due to the heavy winter rains and ponded water that formed in the area to be excavated. To prevent storm water migration offsite, plastic-wrapped earth berms were installed around the area that exhibited ponding. The berms were installed inside the perimeter fencing, between the fence and the exclusion zone. Any water that was observed between the berm and perimeter road was pumped back into the ponded area. The existing straw bales, silt fence, and berm control system along the Oakland Inner Harbor which had been previously installed was checked, and appeared to be effective in preventing storm water migration into the Oakland Inner Harbor. The Navy's Remedial Action Contract (RAC) contractor was tasked with inspecting the site daily and maintaining the berms as required. As a contingency, if the ponding had overflowed the berms, the contractor was prepared to mobilize a vacuum truck and baker tank to pump the rainwater out of the ponded area.

During the month of February, rainfall was not experienced and the site was checked weekly. At the start of the March storms, the contractor checked the integrity of the berms, performed the necessary maintenance, and increased the height of the berm in one area where there was concern that water could flow over the top of the berm. The condition of the site was monitored daily while ponded water was present. As before, if the ponded water threatened to overflow the berms, the contractor had planned to mobilize a vacuum truck and baker tank to pump the rainwater out of the ponded area.

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Observations on the site during the past rain storms indicate that rainwater had ponded in the area to be excavated and the ponding had extended onto other portions of the site. It should be noted that excavation operations had not started on site when the heavy rains began and the contaminants of concern (lead and PCBs) are generally not water soluble, therefore, it is expected that very minimal or no transport of contaminated material has occurred. The Navy proposes to conduct the site excavation as originally planned; however, during the removal action, if it appears that sediment has migrated due to ponding, the Navy will collect field screening samples of sediment to ensure that all contaminants exceeding the established site cleanup levels are removed.

If you have any additional questions regarding this matter, please feel free to contact Mr. Dennis Wong at (415) 244-2526, Fax (415) 244-2654.

Sincerely,

Original signed by:

CAMILLE GARIBALDI
Supervisory RPM for Alameda
By direction of
the Commanding Officer

Copies to:
California Regional Water Quality Control Board (Attn: James Nusrala)
U.S. Environmental Protection Agency (Attn: James Ricks)
NAS Alameda (Attn: LCDR Mike Petouhoff)
NAS Alameda (Attn: Sherri Withrow)
NAS Alameda (Attn: Teresa Bernhard)
PRC Environmental Management, Inc. (Attn: Duane Balch)
International Technology Corp. (Attn: Valerie Crooks)

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